

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

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| IN RE: CLJ HOME HEALTHCARE, LLC DEBTOR | § § § § | BANKRUPTCY CASE NO. <u>25-50983</u> |
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MOTION FOR AUTHORITY TO USE CASH COLLATERAL

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, CLJ Home Healthcare, LLC (“Debtor”) and files this Motion for Authority to Use Cash Collateral and Request for Emergency Consideration pursuant to 11 U.S.C. § 363.

The Debtor presents this motion and respectfully represents the following:

1. On May 1, 2025 ("Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1532 ("Bankruptcy Code") and is now operating its business as a Debtor-In-Possession.

2. The Debtor continues to manage and operate its healthcare business, providing pediatric nurses in the homes of special needs and medically fragile children as Debtor-In-Possession pursuant to §§1107 and 1108 of the Bankruptcy Code.

3. A search in the Texas Secretary of State shows that the following UCC financing statements have been filed by creditors asserting a lien on cash collateral:

- 1 – Frost Bank (UCC Filing No. 21-0058273048) (filed 12/31/2021);
- 2 – Celtic Bank Corporation (UCC Filing No. 23-0033171535 (filed 7/28/2023);

4. Debtor seeks to use the cash collateral for expenses set forth in the 14/30 day budget attached as Exhibit “A” and for any other unforeseeable expenses that may arise and pose a threat to the Debtor’s continued operations.

5. **Emergency Consideration:** The Debtor depends on the use of cash collateral for payroll, insurance, and general operating expenses. Revenue is generated solely through the Debtor's operations. By separate motion, Debtor will request expedited consideration of this motion.

6. It is critical to the operation of the Debtor's business, and to its reorganization efforts, that it be permitted to pay these expenses using cash collateral. The Debtor produces revenue from its operations and would use such revenue to pay the budgeted expenses.

7. Denial of the use of cash collateral would not only halt Debtor's operations, but would cause drastic hardship for Debtor's patients who rely on its nurses for home health. Undersigned counsel can speak from experience that a reliable and trustworthy pediatric nurse is terribly difficult to replace with notice, and impossible to replace on short notice.

8. During the pendency of this case, all revenues will be deposited by Debtor into its DIP operating account pending entry of an order allowing use of cash collateral or consent by lien holders.

9. Attached as Exhibit "A" is a 14- and 30-day budget for the Debtor, showing projected income and expenses. The amounts listed are reasonable and good faith estimations of what the Debtor needs to spend each month to continue the operations of its business and reorganize.

10. In addition to Exhibit A, the following Exhibits are also attached:

Exhibit B

UCC Lien Search Results

11. Debtor requests authority to use the cash collateral for expenses set forth on Exhibit "A" and any other unforeseeable expenses that may arise and pose a threat to the Debtor's continued operations. Specifically, the Debtor requests authority to use the cash collateral to pay

up to 110% of each expense in Exhibit A, so long as the total of cash collateral spent during the month does not exceed by more than 10% of that month's total in Exhibit A.

12. This "First Day Motion" is being filed alongside with the Voluntary Petition under the Court's Standing Order on First Day Motions in Chapter 11 cases.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests this matter be set for an emergency hearing and that upon hearing, the Court will enter an Interim Order authorizing the Debtor's use of the cash collateral in the amounts set forth in Exhibit "A" and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

THE LANE LAW FIRM, PLLC

/s/Robert C. Lane

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(713) 595-8200 Voice

(713) 595-8201 Facsimile

PROPOSED COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Motion for Use of Cash Collateral was served upon the US Trustee and to the parties listed on the service list below and the attached mailing matrix either via electronic notice by the court's ECF noticing system or by United States first class mail, postage prepaid, and or by US First Class Mail Postage Prepaid (Overnight Delivery) on May 5, 2025:

Debtor:

CLJ Home Healthcare, LLC
1003 Beckett Suite 120
San Antonio, TX 78213-1353

US Trustee:

Office of the U.S. Trustee
615 E. Houston Street
Suite 533
San Antonio, TX 78205

Electronic ECF Notice:

United States Trustee - SA12
USTPRegion07.SN.ECF@usdoj.gov

Additional Secured Parties in Interest (US First Class Mail Postage Prepaid Overnight Delivery):

Frost Bank
P.O. Box 34746
San Antonio, TX 78265-4746

Celtic Bank Corporation
c/o BlueVine Capital Inc.
268 South State Street Suite 300
Salt Lake Cit, UT 84111

Additional Electronic Notice via Email:

Lorenzo.Palacios@frostbank.com

bncmail@w-legal.com

support@bluevine.com

help@celticbank.com

/s/Robert C. Lane
Robert C. Lane

Label Matrix for local noticing
0542-5
Case 25-50983-mmp
Western District of Texas
San Antonio
Mon May 5 12:04:13 CDT 2025

CLJ Home Healthcare, LLC
1003 Beckett Ste 120
San Antonio, TX 78213-1372

United States Trustee (SMG511)
U.S. Trustee's Office
615 E. Houston, Suite 533
P.O. Box 1539
San Antonio, TX 78295-1539

U.S. BANKRUPTCY COURT
615 E. HOUSTON STREET, ROOM 597
SAN ANTONIO, TX 78205-2055

American Express
Bankruptcy Unit
P.O. Box 297817
Ft Lauderdale, FL 33329-7817

American Express
P.O. Box 6031
Carol Stream, IL 60197-6031

Celtic Bank Corporation
c/o BlueVine Capital Inc.
268 South State Street Suite 300
Salt Lake City, UT 84111-5314

Celtic Bank Corporation
c/o C T Corporation System
1999 Bryan St 900
Dallas, TX 75201-3140

Frost Bank
P.O. Box 34746
San Antonio, TX 78265-4746

Frost Bank
c/o Corporation Service Company dba CSC
211 E. 7th Street 620
Austin, TX 78701-3218

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Matthew Strange
210 Royal Oaks Dr
San Antonio, TX 78209-2304

ODK Capital, LLC
4700 W. Daybreak Pkwy 200
South Jordan, UT 84009-5133

RoyJam Real Estate, LLC
1003 Beckett Ste 207
San Antonio, TX 78213-1372

Senesa Properties
c/o Valcor Commerical Real Estate
1723 N Loop 1604 E Ste 204
San Antonio, TX 78232-1672

Senesa Properties, Inc
c/o Warren Williams
2181 Waterford Grace
New Braunfels, TX 78130-8972

Teresa Gutierrez
1147 Sapling Spg
New Braunfels, TX 78132-2676

The Lane Law Firm
6200 Savoy Dr Ste 1150
Houston, TX 77036-3369

U.S. Bank
1310 Madrid Street 101
Marshall, MN 56258-4002

US Bank Equipment Finance
1310 Madrid St
Marshall, MN 56258-4099

United States Trustee - SA12
US Trustee's Office
615 E Houston, Suite 533
San Antonio, TX 78205-2055

Robert Chamless Lane
The Lane Law Firm PLLC
6200 Savoy Dr Ste 1150
Houston, TX 77036-3369

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Internal Revenue Service
324 25th St
Ogden, UT 84401-2310

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)CLJ Home Healthcare, LLC
1003 Beckett Ste 120
San Antonio, TX 78213-1372

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| End of Label Matrix | |
| Mailable recipients | 21 |
| Bypassed recipients | 1 |
| Total | 22 |